

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE WORLD TRADE CENTER  
DISASTER SITE LITIGATION

21 MC 102/103 (AKH)

THIS DOCUMENT APPLIES TO ALL IN  
RE WORLD TRADE CENTER AND  
LOWER MANHATTAN DISASTER  
SITE LITIGATION

**RESPONSE OF MERRILL LYNCH &  
CO., INC. and 222 BROADWAY, LLC  
TO PLAINTIFFS' NOTICE TO  
PRODUCE DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, McGuireWoods LLP, on behalf of defendants Merrill Lynch & Co., Inc. and 222 Broadway, LLC (hereinafter, "Merrill Lynch"), hereby responds to Plaintiffs' Notice to Produce Documents, dated June 29, 2012, in the above-captioned litigation as follows. Merrill Lynch reserves its right to supplement or amend this response as appropriate. Moreover, Merrill Lynch incorporates by reference its General Objections to Plaintiffs' Liaison Counsel's Discovery Demands.

**RESPONSE TO PLAINTIFFS' NOTICE TO PRODUCE DOCUMENTS**

1. Any and all records referencing the [named] plaintiffs within your possession, including but not limited to medical records, employment records, work records, work logs, sign in sheets, attendance sheets, crew sheets, and City, State and/or Federal created and/or maintained records including but not limited to NYCDEP and OSHA.

Response: Merrill Lynch has previously uploaded any responsive documents to the Merrill Lextranet Database on January 7, 2009. See ML 0000001-ML 0150130.

Dated: New York, New York  
July 30, 2012

McGUIREWOODS LLP

By:



Loree J. Shelko (LS-0825)  
Attorneys for Defendants Merrill Lynch &  
Co., Inc. and 222 Broadway, LLC  
1345 Avenue of the Americas, 7<sup>th</sup> Floor  
New York, New York 10105-0106  
(212) 548-2100

TO: All counsel of record via ECF